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### **REMARKS**

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicant asserts that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### **Status of Claims**

Claims 1-60 are pending in the application. Claims 43-60 have been withdrawn from consideration. Claims 1-42 have been rejected. Claims 1 and 23 have been amended.

Applicant respectfully asserts that the amendments to the claims add no new matter.

### **CLAIM REJECTIONS**

#### **35 U.S.C. § 102 Rejections**

In the Office Action, the Examiner rejected claims 1-10, 14-16, 19-21, 23-27 and 30-39 under 35 U.S.C. § 102(e), as being anticipated by Monroe US 2003/0025599 A1. Applicant respectfully traverses this rejection in view of the remarks that follow.

Applicant respectfully asserts that the Examiner has failed to establish a prima facie case of anticipation, because the cited reference neither teaches nor suggests every element

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and limitation recited in independent claims 1 and 23 as filed. More specifically, Applicant respectfully asserts that the Examiner has erroneously analogized between the teachings of the cited reference and the limitations recited in independent claims 1 and 23 of the pending Application, due to a misinterpretation of teaching of the cited reference and inference of subject matter which actually was not taught in the cited reference. The cited reference fails to teach or even suggest the limitations of “...**first security station and said at least second security station [that] have concurrent access to said security data; and opening a communication link between said first security station and said at least second security station.**”. Conversely, the cited reference simply teaches “A method for identifying the occurrence of an event at a remote location, prioritizing the event, and then, based on the priority, forwarding the event to selected stations on a network...”.

As explained above, Applicant respectfully asserts that the cited reference is clearly insufficient as an anticipatory reference in light of pending independent claims as filed, and that the Examiner has erroneously attempted to infer subject matter which actually was not taught in the cited reference. **However, In the interest of expediting the present prosecution, Applicant has voluntarily amended independent claims 1 and 23 to better clarify the subject matter recited in pending independent claims.**

More specifically, independent claims 1 and 23 (after amendment), respectively, recite the transmission of security data from a first security stations or viewing unit to a second security stations or viewing unit, and the establishment of a **bidirectional** communication link between them so as to allow communication between the respective operators.

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Whereas, the cited reference generally teaches:

“A method for identifying the occurrence of an event at a remote location, prioritizing the event, and then, based on the priority, forwarding the event to selected stations on a network incorporates a scheme for tagging the event with the location, type and priority of event at the point where a sensor picks up the event. Event data is then forwarded only to selected stations on the network as required by a priority hierarchy. This permits a large amount of data to be collected at the site of a sensor while minimizing transmission of the data to an as-needed basis, reducing the overall bandwidth requirements of the system. In one aspect, legacy device signals, appliance signals and video and still image data generated at a remote location includes is collected on a preselected basis for defining and transmitting an original condition to the remote location. Subsequent data is compared to the data representing the original condition. The transmitted data may be tagged with unique identifying components. The transmitted data is stored for archival, search and retrieval. A notification signal may also be generated and based on prioritization may be forwarded to selected recipients. Notification is also visually indicated on map and other graphic display monitors.” (Monroe Abstract)

Examiner of the reference suggests that the Examiner interpreted the sensors of the reference as "a security station" or "viewing unit". However, the reference actually makes no mention of sharing security information between two points and establishing bidirectional communication between those two points to facilitate operator communication.

As is well established, in order to successfully assert a prima facie case of anticipation, the Examiner must provide a single prior art document that includes every element and limitation of the claim or claims being rejected. Applicant respectfully asserts that the Monroe reference fails to teach all limitations of independent claims 1 and 23 as filed. Moreover, after voluntary amendments made to independent claims 1 and 23, it should be even clearer now to anyone of ordinary skill in the art that the cited reference fails to teach

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"transmission of security data from a first security stations or viewing unit to a second security stations or viewing unit, and the establishment of a **bidirectional** communication link between them so as to allow communication between the respective operators."

Accordingly, the cited reference does not anticipate independent claims 1 and 23. Therefore, Applicant respectfully requests reconsideration and withdrawal of the 102 rejections of independent claims 1 and 23, and all dependent claims which depend from claims 1 and 23.

### **35 U.S.C. § 103 Rejections**

In the Office Action, the Examiner rejected claims 11, 13, 40 and 41 under 35 U.S.C. § 103(a), as being unpatentable over Monroe US 2003/0025599 A1 as applied to claim 1 above, and further in view of O'Hara US 2003/0058084 A1.

In view of the remarks and arguments above, Applicant asserts that these claims are allowable by virtue of their dependence on allowable base claims. Reconsideration and withdrawal of the 103 rejections is respectfully requested.

In view of the foregoing amendments and remarks, all the pending claims are considered to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the

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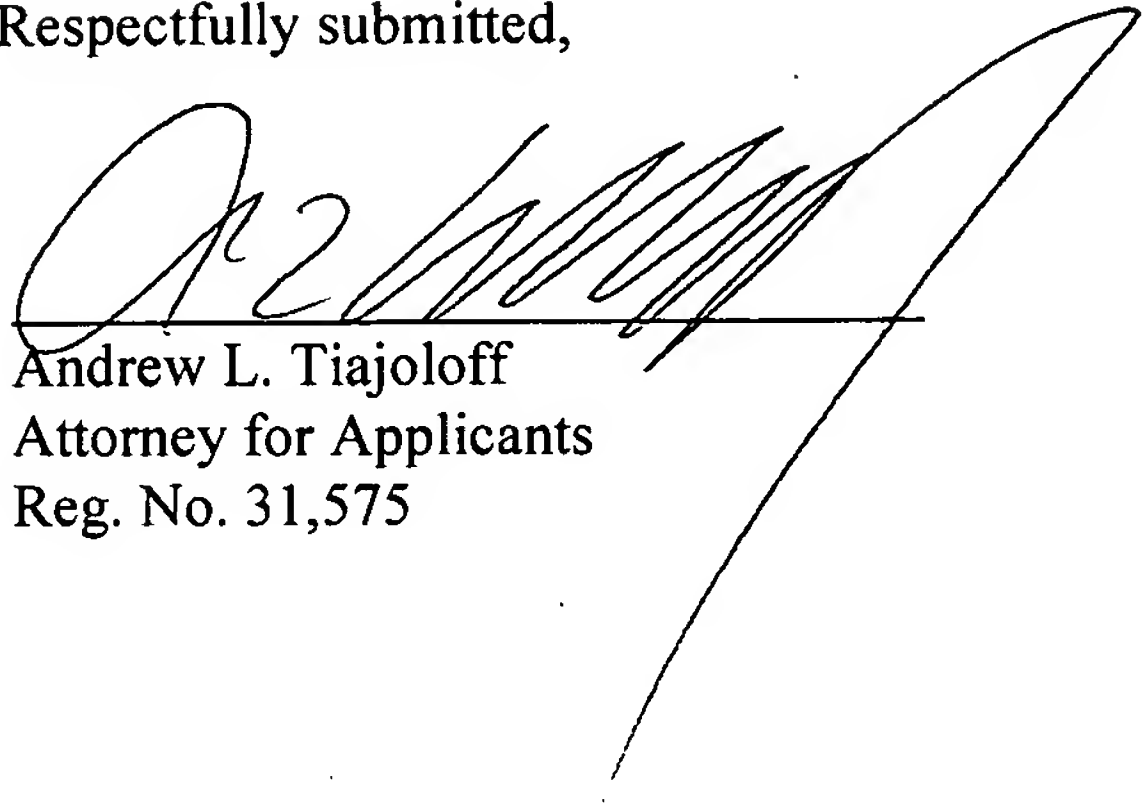
prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Respectfully submitted,

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